

**REMARKS**

Claims 1-41 are pending in the application. Claims 1-41 are rejected. Claims 1-3, 5, 6, 9, 10, 12, 13, 20-22, 24, 25-28, 31, 32, 37, and 38 have been amended. The amendments were made to clarify the steps of the claimed methods and fix claim dependency. The amendments were not made in response to rejections for patentability or prior art. No new matter has been added and no new issues are presented. Applicant understands that any rejection under new art is to be non-final. Applicant submits that pending claims 1-41 are now in condition for allowance.

**Claim Rejections under 35 U.S.C. §103****I. Claims 1-3, 12, 13, 20-22, 25-28, 31, 32, 37 and 38**

Claims 1-3, 12, 13, 20-22, 25-28, 31, 32, 37, and 38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) in further view of Kikuchi (U.S. Patent No. 4,819,189). Applicant respectfully traverses this rejection on the basis of the following remarks.

**Summary of Sanford (U.S. Patent No. 6,256,028 B1)**

The Sanford reference is directed to a method, system and computer-readable medium for allowing easier access of web pages of a web site. A requested web page is downloaded with a site browser and datafile assigned the web site. The site browser includes a version identifier, and the datafile includes a timestamp. A set of left-to-right cascading menus are generated based on the downloaded site browser and datafile. The datafile is a hierarchical data structure comprising titles of the web site's web pages and links to the titled web pages. The site browser and datafile are automatically updated, if it is determined that more current versions exist

**Summary of Kikuchi (U.S. Patent No. 4,819,189)**

The Kikuchi reference is directed to a terminal computer used as a workstation having a display unit which displays a desired number of windows on its display screen, allowing the windows to overlap one upon another. Plural pieces of data specifying the positions and sizes of the windows are stored into a memory. Data representing the display

priorities of the windows are stored into another memory. A coordinate input device, known as "a mouse," is manually operated by an operator, and a cursor displayed on the screen of the display unit moves with movement of the mouse on a flat surface. The most current coordinates of the cursor on the screen are stored as present-cursor position data into a memory. A window presentation controlling section is provided for comparing the present-cursor position data with the positions and sizes of the windows. When the cursor is detected to have moved into one window on the screen, the window presentation controlling section controls the display unit to automatically move this window in front of the other windows on the screen. In this case, the frontmost window is entirely visible, while the other windows are hidden at least partially behind that window.

Claims 1, 12, 20, 25, 26, 31, and 37

Neither Sanford nor Kikuchi, alone or in combination, teach or suggest each and every element of independent claims 1, 12, 20, 25, 26, 31, and 37. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The Examiner has admitted that Sanford does not disclose this claim limitation (See top of page 3 in present Office Action). The combination with Kikuchi fails to cure this deficiency. Kikuchi teaches a method of automatically moving a window in front of the other windows when the cursor is detected to have moved into the window on the screen. In this case, the frontmost window is entirely visible, while the other windows are hidden at least partially behind that window. Kikuchi teaches moving the cursor from an active window to another inactive window to activate the inactive window. Kikuchi does not teach or disclose manipulating said pointing device so that said cursor in said first view enters an active region located within said graphical reference to a sub-level.

Furthermore, Applicant disagrees with the Examiner's suggestion that it would have been obvious to a person of ordinary skill in the art to combine the system and method of navigating a heirarchical diagram, in the form of a Web-based menu system, of Sanford, with the cursor control and display manipulation of Kikuchi. Sanford teaches using a heirarchical menu within a web-browser. Kikuchi teaches activating windows by moving from one window to

another. Kikuchi has no application to Sanford because Sanford does not require moving the cursor between multiple windows. Sanford deals with a heirachical menu within a web-browser, within a single window.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 1, 12, 20, 25, 26, 31, and 37 under 35 USC § 103(a).

Claims 2, 13, 21, 27, 32, and 38

Claims 2, 13, 21, 27, 32 and 38 depend from independent claims 1, 12, 20, 26, 31, and 37 respectively and as such incorpotate each and every element of their respective independent claims. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 1, 12, 20, 26, 31, and 37. Therefore Sanford and Kikuchi fail to teach or suggest each and every element of claims 2, 13, 21, 27, 32, and 38.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 2, 13, 21, 27, 32, and 38 under 35 USC § 103(a).

Claims 3, 22, and 28

Claims 3, 22, and 28 depend from independent claims 1, 20, and 26 respectively and as such incorpotate each and every element of their respective independent claims. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 1, 20, and 26. Therefore Sanford and Kikuchi fail to teach or suggest each and every element of claims 3, 22, and 28.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 3, 22, and 28 under 35 USC § 103(a).

**II. Claims 4-6**

Claims 4-6 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) and Kikuchi (U.S. Patent No. 4,819,189) further in view of Young

(U.S. Patent No. 5,299,307). Applicant respectfully traverses this rejection on the basis of the following remarks.

Summary of Young (U.S. Patent No. 5,299,307)

The Young reference is directed to a computer system providing a method and an apparatus for generating and manipulating graphic objects on a computer display screen. The computer aided design and drawing system includes a graphic guide used for associating edges and points of one graphic image with one or more other images. The graphic guide operates in relation to the position of a cursor on the computer display screen. After a first image has been drawn on the screen, the graphic guide automatically is initiated to assist the user in positioning and sizing a second and subsequent images that are drawn on the display screen. The computer system also includes a wall tool used for efficiently generating wall objects displayed on the display screen. Wall objects are generated and manipulated by specifying the width of the wall, displaying joints between walls, capping the ends of walls, and efficiently measuring the interior, exterior or center dimension of a wall. There is also a clean up tool used for manipulating and modifying the intersection, the joining, and the extension of graphic images displayed on the display screen. The clean up tool can be used to automatically remove interior line segments of objects, to remove desired portions of objects, or to automatically extend and join two objects.

Claims 4-6

Claims 4-6 depend either directly or indirectly from independent claim 1 and as such incorporate each and every element of claim 1. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claim 1. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Young fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, and Young fails to teach or suggest each and every element of claims 3, 22, and 28.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 4-6 under 35 USC § 103(a).

**III. Claims 7, 8 11, 19, 23, 24, 29, 30, 36, and 41**

Claims 7, 8, 11, 19, 23, 24, 29, 30, 36, and 41 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) and Kikuchi (U.S. Patent No. 4,819,189) further in view of Falcon (U.S. Patent No. 6,285,374 B1). Applicant respectfully traverses this rejection on the basis of the following remarks.

**Summary of Falcon (U.S. Patent No. 6,285,374 B1)**

The Falcon reference is directed to a system controlling acquisition of visual targets with a cursor in a visual display on a screen. A coordinate system is provided which is associated with the screen. A pointer is also provided which is associated with the cursor and which comprises a plurality of points in the coordinate system which define a cursor hot spot. The pointer is moved within the coordinate system based on position information from a user input device. A target region is provided in the coordinate system. The target region corresponds to a visual target and is acquired when at least one of the points in the cursor hot spot coincides with the target region.

**Claims 7, 19, 23, 29, 36, and 41**

Claims 7, 19, 23, 29, 36, and 41 depend from independent claims 1, 12, 20, 26, 31, and 37 respectively and as such incorporate each and every element of their respective independent claims. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 1, 12, 20, 26, 31, and 37. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Falcon fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, and Falcon fails to teach or suggest each and every element of claims 7, 19, 23, 29, 36, and 41.

Furthermore, Falcon does not teach or suggest the claim limitations of claims 7, 19, 23, 29, 36, and 41. In particular, Falcon does not teach or suggest, providing a wormhole around the active region, the wormhole being a visual aid displayed in the display which indicates the location of the active region. The hotspot referenced in Falcon, refers to an indicated area of the

cursor that allows interaction with the graphic display. In effect, it is the active area of the cursor that needs to be in contact with a target in the graphic display for the cursor to interact with the target. This is not what is claimed in claims 7, 19, 23, 29, 36, and 41. The wormhole claimed in claims 7, 19, 23, 29, 36, and 41 is around the active region indicating the active region.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 7, 19, 23, 29, 36, and 41 under 35 USC § 103(a).

#### Claim 8

Claim 8 depends from claim 7 which depends from independent claim 1, and, as such, incorporates each and every element of claims 1 and 7. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claim 1. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Falcon fails to cure this deficiency. Furthermore, as discussed above, Falcon does not teach or suggest each and every element of claim 7. Therefore, the combination of Sanford, Kikuchi, and Falcon fails to teach or suggest each and every element of claim 8.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claim 8 under 35 USC § 103(a).

#### Claims 11, 24, and 30

Claims 11, 24, and 30 depend directly from claims 7, 23, and 29 respectively, which depend from independent claims 1, 20, and 26 respectively and, as such, incorporate each and every element of respective claims 1, 7, 20, 23, 26, and 29. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 1, 20, and 26. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Falcon

fails to cure this deficiency. Also, as discussed above, Falcon fails to teach or suggest each and every element of claims 7, 23, and 29. In particular, Falcon does not teach or suggest providing a wormhole around the active region, the wormhole being a visual aid displayed in the display which indicates the location of the active region. Therefore, the combination of Sanford, Kikuchi, and Falcon fails to teach or suggest each and every element of claims 11, 24, and 30.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 11, 24, and 30 under 35 USC § 103(a).

#### **IV. Claims 9 and 10**

Claims 9 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1), Kikuchi (U.S. Patent No. 4,819,189) and Falcon (U.S. Patent No. 6,285,374 B1) and further in view of Slotznick (U.S. Publication 2002/0178007 A1). Applicant respectfully traverses this rejection on the basis of the following remarks.

#### **Summary of Slotznick (U.S. Publication 2002/0178007 A1)**

The Slotznick reference is directed to Web pages and other text documents displayed on a computer reformatted to allow a user who has difficulty reading to navigate between and among such documents and to have such documents, or portions of them, read aloud by the computer using a text-to-speech engine in their original or translated form while preserving the original layout of the document. A "point-and-read" paradigm allows a user to cause the text to be read solely by moving a pointing device over graphical icons or text without requiring the user to click on anything in the document. Hyperlink navigation and other program functions are accomplished in a similar manner.

#### **Claims 9 and 10**

Claims 9 and 10 depend from claim 8, which depends from claim 7, which depends from independent claim 1 and, as such, incorporate each and every element of claims 1, 7, and 8. As discussed above, the combination of Sanford, Kikuchi, and Falcon fails to teach or suggest each and every element of claims 1, 7, and 8. In particular, they don't teach or suggest automatically triggering replacement of the first view with a second view representing the sub-level upon the

cursor reaching the active region, wherein the cursor appears in the second view or the use of wormholes, as required by the language of these claims. The addition of Slotznick fails to cure these deficiencies. Therefore, the combination of Sanford, Kikuchi, Falcon, and Slotznick fails to teach or suggest each and every element of claims 9 and 10.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 9 and 10 under 35 USC § 103(a).

**V. Claims 14, 15, 18, 33, 34, 39, and 40**

Claims 14, 15, 18, 33, 34, 39, and 40 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) and Kikuchi (U.S. Patent No. 4,819,189) and further in view of Simmons (U.S. Patent No. 6,396,488 B1). Applicant respectfully traverses this rejection on the basis of the following remarks.

**Summary of Simmons (U.S. Patent No. 6,396,488 B1)**

The Simmons reference is directed to a system for determining a path in a graphical diagram including a processor coupled to an input device, an output device, a memory, and a data retrieval device. The processor executes an application to determine a path through a portion of a graphical diagram, to record path information defining the path, and to reproduce a copy of the path using the path information.

**Claims 14, 18, 33, and 39**

Claims 14, 18, 33, and 39 depend from independent claims 12, 31, and 37 respectively and, as such, incorporate each and every element of their respective independent claims. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 12, 31, and 37. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Simmons fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, and Simmons fails to teach or suggest each and every element of claims 14, 18, 33, and 39.



Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 14, 18, 33, and 39 under 35 USC § 103(a).

Claims 15, 34, and 40

Claims 15, 34, and 40 depend directly or indirectly from independent claims 12, 31, and 37 respectively and, as such, incorporate each and every element of their respective independent claims. As discussed above, neither Sanford nor Kikuchi teach or suggest each and every element of claims 12, 31, and 37. In particular, neither teaches or suggests automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Simmons fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, and Simmons fails to teach or suggest each and every element of claims 15, 34, and 40.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 15, 34, and 40 under 35 USC § 103(a).

**VI. Claim 17**

Claim 17 is rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) and Kikuchi (U.S. Patent No. 4,819,189) and further in view of Simmons (U.S. Patent No. 6,396,488 B1) and Mathworks Stateflow 3.0.2. Applicant respectfully traverses this rejection on the basis of the following remarks.

Summary of Mathworks Stateflow 3.0.2.

The cited reference to Mathworks Stateflow 3.0.2 is a print-out of a webpage from Mathworks website advertising the Stateflow 3.0.2 product.

Claim 17

Claim 17 depends from independent claim 12 and, as such, incorporates each and every element of independent claim 12. As discussed above, the combination of Sanford, Kikuchi and

Simmons fails to teach or suggest each and every element of claim 12. In particular, they don't teach or suggest automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of the Mathworks Stateflow 3.0.2 reference fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, Simmons and the Mathworks Stateflow 3.0.2 reference fails to teach or suggest each and every element of claim 17.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claim 17 under 35 USC § 103(a).

## **VII. Claims 16 and 35**

Claims 16 and 35 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sanford (U.S. Patent No. 6,256,028 B1) and Kikuchi (U.S. Patent No. 4,819,189) and further in view of Simmons (U.S. Patent No. 6,396,488 B1) and Kodosky (U.S. Patent No. 4,901,221). Applicant respectfully traverses this rejection on the basis of the following remarks.

### **Summary of Kodosky (U.S. Patent No. 4,901,221)**

The Kodosky reference is directed to a method for programming a computer system having a display console for displaying images to control at least one of a virtual instrument and an instrument by the steps of displaying on the screen at least one first function-icon that references at least one first control module for controlling at least one first function; displaying on the screen at least one iteration-icon that references iteration control module for controlling multiple iterations of data flow; displaying on the screen at least one first input variable-icon that references at least one first input variable; displaying on the screen at least one first output variable-icon that references at least one first output variable; and assembling on the screen a first acyclic data flow diagram including the at least one first function-icon and the at least one iteration-icon and the at least one first input variable-icon and the at least one first output variable-icon, such that the diagram displays a first procedure for producing at least one value for the at least one first output variable-icon from at least one value for the at least one first input

variable-icon, and such that the at least one iteration-icon in the diagram indicates multiple iterations of the at least one first function in the course of the first procedure.

Claims 16 and 35

Claims 16 and 35 depend from independent claims 12 and 31 respectively and, as such, incorporate each and every element of their respective independent claims. As discussed above, the combination of Sanford, Kikuchi, and Simmons fails to teach or suggest each and every element of claims 12 and 31. In particular, they fail to teach or suggest automatically triggering replacement of the first view with a second view representing the sub-level upon the cursor reaching the active region, wherein the cursor appears in the second view, as required by the language of these claims. The addition of Kodosky fails to cure this deficiency. Therefore, the combination of Sanford, Kikuchi, Simmons, and Kodosky fails to teach or suggest each and every element of claims 16 and 35.

Therefore, in view of the above arguments, Applicant respectfully requests the reconsideration and withdrawal of the rejection to claims 16 and 35 under 35 USC § 103(a).

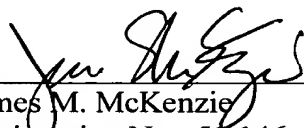
**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. MWS-006US from which the undersigned is authorized to draw.

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Respectfully submitted,

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